



Mr. James Saric
Remedial Project Manager
USEPA Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604-3507

Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Supplemental Remedial Investigations/Feasibility Studies
Semi-Annual Progress Report (August 2007 – January 2008)
Annual Area-Specific Work Report (2007)

Dear Jim:

Attached is the second semi-annual progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Supplemental Remedial Investigations/Feasibility Studies (SRI/FS). This progress report is submitted as per Section 7.2 of the Statement of Work (SOW) for the February 2007 Administrative Settlement Agreement and Order on Consent (AOC) for Remedial Investigations/Feasibility Studies (Docket No. V-W-07-C-864). Per Section 7.2 of the SOW, the semi-annual progress reports "shall address all areas of the Site where Respondents perform SRI/FS activities and shall summarize overall progress in completing the work required by the AOC and SOW."

As per Section 1.1.1 of the SOW, "for each Area or OU of the Site with ongoing work, including ongoing monitoring and/or operation and maintenance of existing systems, the Respondents shall continue any such ongoing work unless modifications are approved in writing by USEPA. Reporting of any such ongoing work will be in accordance with the Schedule on Exhibit A to this SOW". To meet this requirement, this letter report also includes the first annual area-specific work reports for Areas 2 through 7. The Master Schedule for the Site, which was submitted in March 2007, states "As appropriate, the annual Area-specific work reports may be included as an element of the Semi-Annual Progress Reports." As stated in Exhibit A, these reports are to be submitted "for each Area, annually until USEPA's approval of an Area-Specific Work Plan for that Area". Because the USEPA approved a work plan for Area 1 as part of the AOC, Area 1 does not have an area-specific work report.

ARCADIS
10559 Citation Dr., Suite 100
Brighton
Michigan 48116
Tel 810.229.8594
Fax 810.229.8837
www.arcadis-us.com

INDUSTRIAL

Date:
February 18, 2008

Contact:
Michael J. Erickson, P.E.

Phone:
810.225.1924

Email:
michael.erickson@
arcadis-us.com

Our ref:
B0064524.00014 #2

Imagine the result



295263

If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS

A handwritten signature in dark ink, appearing to read "Michael J. Erickson". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Michael J. Erickson, P.E.
Associate Vice President

Attachment

Copies:

Michael Berkoff, USEPA
Sam Chummar, USEPA
Michael Ribordy, USEPA
Paul Bucholtz, MDEQ
Jeff Keiser, CH2M HILL
Bonnie Barnett, Esq., Drinker Biddle & Reath LLP
Steven Cook, Esq., Millennium Holdings, LLC
J. Michael Davis, Esq., Georgia-Pacific Corporation
Mellonie Fleming, Esq., Georgia-Pacific Corporation
Mark Tapp, Millennium Holdings, LLC
David Guier, Millennium Holdings, LLC
Suda Arakere, Millennium Holdings, LLC
Paul Montney, P.E., Georgia-Pacific Corporation
L. Chase Fortenberry, P.G., Georgia-Pacific Corporation
Mark Brown, Ph.D., Georgia-Pacific Corporation

**SEMI-ANNUAL PROGRESS REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/
KALAMAZOO RIVER SUPERFUND SITE
SRI/FS**

REPORT #2, AUGUST 2007 TO JANUARY 2008

**PREPARED BY ARCADIS
ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP (KRSG)**

SUBMITTED TO

**JAMES SARIC, REMEDIAL PROJECT MANAGER
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Semi-Annual Progress Report for the Allied Paper, Inc./Portage Creek/
Kalamazoo River Superfund Site SRI/FS**

REPORT #2, AUGUST 2007 TO JANUARY 2008

Areas of the Site where SRI/FS Activities Have Been Performed Pursuant to the AOC and SOW

- Operable Unit 5 (OU 5) - Kalamazoo River from Morrow Dam to Lake Michigan and Portage Creek from Alcott Street to the confluence.

Summary of Overall Progress in Completing Work Required by the AOC and SOW - Area 1 and Multi-Area

AOC Requirements

- As discussed in Section 28b of the AOC, the United States Environmental Protection Agency (USEPA) and Michigan Department of Environmental Quality (MDEQ) were notified in advance of sample collection activities.
- The six monthly progress reports generated during the August 2007 to January 2008 period were submitted on time, as required by Section 37 of the AOC and Section 7.1 of the SOW.

SOW Requirements

Task 1. Project Scoping and SRI/FS Planning Documents

Submittals approved by USEPA and finalized:

- On September 24, USEPA notified the KRSG of its approval of the *Multi-Area Field Sampling Plan* (FSP), which was submitted to USEPA on April 25, 2007. On October 25, the final FSP was submitted to the USEPA. This report is discussed in Section 1.2.1.1 of the SOW.
- In October, the KRSG received the signed approval sheet from the final *Multi-Area Quality Assurance Project Plan*, which was submitted to the USEPA on June 29, 2007. This report is discussed in Section 1.2.1.2 of the SOW.

Activities toward completion of other requirements:

- During the period, ARCADIS and USEPA discussed the ecological risk assessment report peer review process, including the selection of the Peer Review Manager and the charge to the peer review panel. This process is discussed in Section 1.2.1.3 of the SOW. Dr. Ken Dickson was selected as the Peer Review Manager.
- On August 16, ARCADIS participated in a meeting with the MDEQ to discuss the utilization of fish tissue data from the long-term monitoring program in the Michigan Department of Community

**Semi-Annual Progress Report for the Allied Paper, Inc./Portage Creek/
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REPORT #2, AUGUST 2007 TO JANUARY 2008

Health's fish consumption advisory reviews. ARCADIS received a copy of CDM's Inlet/Outlet Investigation report, dated August 2007, at the meeting. The long-term monitoring program is discussed in Section 1.1.1.1 of the SOW.

- On September 12, USEPA forwarded to ARCADIS information from the USEPA FIELDS personnel about reconnaissance USEPA conducted adjacent to the Crown Vantage landfill.
- On September 13, ARCADIS forwarded to USEPA three boxes containing example data packages for the data usability determination. This is discussed in Section 1.1.2 of the SOW.
- On September 21, ARCADIS submitted the first semi-annual progress report to USEPA. This report is discussed in Section 7.2 of the SOW and covers the February 2007 to July 2007 period.
- On October 5, ARCADIS transmitted to the USEPA the draft risk assessment framework for review. On January 28, USEPA and MDEQ provided comments on the framework. This framework is discussed in Section 1.2.1.5 of the SOW.
- On October 26, USEPA forwarded to ARCADIS and MDEQ a proposed plan for the formation of a Kalamazoo citizens advisory group.
- On December 6, the KRSG submitted to USEPA and MDEQ a post-construction sampling plan for sampling surface sediment at the 2007 Plainwell Time-Critical Removal Action (TCRA) removal areas. On December 17, the KRSG requested that USEPA approve the plan prior to commencement of sampling activities. Based on revisions requested by USEPA, the sampling plan was revised and resubmitted on January 2. On January 7, USEPA provided approval of the plan. ARCADIS forwarded a hard copy to the USEPA that same day. This post-construction sediment sampling work is described in Section 3.4.5 of the February 2007 *SRI/FS Work Plan – Morrow Dam to Plainwell* (SRI/FS Work Plan).
- On January 22, ARCADIS provided to USEPA and MDEQ the results of its reconnaissance of the area of historical inundation near Plainwell No. 2 Dam and provided a proposed soil sampling plan for review. This work is discussed in Section 3.4.2 of the SRI/FS Work Plan.

Submittals awaiting completion:

- The KRSG awaits acceptance of the *Data Management Plan* (see Section 1.3 of the SOW), which was submitted to USEPA on June 8, 2007.
- The KRSG awaits USEPA's comments on the draft *Conceptual Site Model* (CSM), which was submitted to USEPA on June 21, 2007. This report is discussed in Section 1.2.1.4 of the SOW.

**Semi-Annual Progress Report for the Allied Paper, Inc./Portage Creek/
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- The KRSG awaits USEPA's response to a letter requesting USEPA's data usability determination for existing data for purposes of the SRI/FS, which was submitted to USEPA on August 27, 2007. Data usability is discussed in Section 1.1.2 of the SOW.

Task 2. Site Characterization

- In September and October, ARCADIS performed sediment probing along transects in Portage Creek (transects PCT1 through PCT53). This sampling is discussed in Section 3.4.1.3 of the SRI/FS Work Plan. MDEQ provided oversight.
- In October, ARCADIS probed and collected cores along transects between the former Georgia-Pacific Mill Lagoons and the Crown Vantage Landfill (transects KRT-1 through KRT-10). ARCADIS also probed and collected cores along transects between the Plainwell No. 2 Dam and the Mill Race Confluence (transects KRT-11 through KRT-16). This Phase I sampling is discussed in Sections 3.4.1.1 and 3.4.1.2 of the SRI/FS Work Plan. The cores were segmented in January 2008. MDEQ provided oversight.
- In October, ARCADIS collected sediment cores along transects located in the reach of the Kalamazoo River from the former Georgia-Pacific Mill Lagoons to the Crown Vantage Landfill (transects KPT-19 through KPT-29). ARCADIS also collected sediment cores along transects located between the Plainwell No. 2 Dam and the Mill Race Confluence (transects KPT-48 to KPT-56). These locations were first established and sampled in 1993/1994, and then resampled in 2000. This Phase I sampling is discussed in Sections 3.4.1.1 and 3.4.1.2 of the SRI/FS Work Plan. MDEQ provided oversight.
- From October 6 through December 19, ARCADIS collected water column samples every other day at two locations associated with the Plainwell TCRA. This sampling is discussed in Section 3.4.5 of the SRI/FS Work Plan.
- In October and November, ARCADIS collected top-of-bank soil cores along the mill race and the Kalamazoo River channel between the Plainwell No. 2 Dam and the confluence of the mill race and the river. This work is discussed in Section 3.4.2.2 of the SRI/FS Work Plan. These cores were segmented in January 2008 with MDEQ oversight.
- In November, ARCADIS reconnoitered and surveyed the area of historical inundation near Plainwell No. 2 Dam. This Phase I work is discussed in Section 3.4.2.1 of the SRI/FS Work Plan.
- In November, ARCADIS reconnoitered the sediment in the side channel at the Crown Vantage Landfill Area and reconnoitered the floodplain adjacent to the Crown Vantage Landfill Area. This Phase I work is discussed in Section 3.4.3 of the SRI/FS Work Plan.

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- In November and December, ARCADIS delineated the materials associated with five of the focused samples (FF-32, FF-35, FF-37, FF-40 and FF-42) collected in 2000 between the Crown Vantage Landfill and the Plainwell No. 2 Dam. This work is discussed in Section 3.4.4 of the SRI/FS Work Plan.
- In December, ARCADIS performed bathymetric monitoring following completion of the 2007 construction season activities associated with the Plainwell TCRA. This monitoring is discussed in Section 3.4.5 of the SRI/FS Work Plan.
- In January, ARCADIS collected the post-construction surface sediment samples from the 2007 TCRA removal areas. This work is discussed in Section 3.4.5 of the SRI/FS Work Plan.

Task 3. Remedial Investigation Report (including ecological and human health risk assessment)

- No meetings, submittals, or notifications.

Task 4. Treatability Studies (if needed)

- No meetings, submittals, or notifications.

Task 5. Development of Screening Alternatives (Technical Memorandum)

- No meetings, submittals, or notifications.

Task 6. Detailed Analysis of Alternatives (FS Report)

- No meetings, submittals, or notifications.

Task 7. Progress Reports

- The six monthly progress reports generated during the August 2007 to January 2008 period were submitted on time, as required by Section 7.1 of the SOW.
- The first semi-annual progress report for Area 1 was submitted to USEPA as required by Section 7.2 of the SOW.

**Semi-Annual Progress Report for the Allied Paper, Inc./Portage Creek/
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REPORT #2, AUGUST 2007 TO JANUARY 2008

ANNUAL AREA-SPECIFIC WORK REPORTS (AREAS 2 THROUGH 7)

Summary of Overall Progress in Completing Work Required by the AOC and SOW - Area 2

- In November, ARCADIS collected yearling smallmouth bass in the Otsego City Impoundment to assess effects of the Plainwell TCRA. This sampling is discussed in Section 3.4.5 of the Area 1 SRI/FS Work Plan. As discussed in Section 28b of the AOC, the USEPA and MDEQ were notified in advance of sample collection activities.

Summary of Overall Progress in Completing Work Required by the AOC and SOW - Areas 3 through 7

- No AOC-required or SOW-required work was performed in Areas 3 through 7 in 2007.